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April 29, 2025

## **Filed via ECF**

Hon. Barbara Moses  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 740  
New York, New York 10007

Re: *In Re Kobalt Music Publishing America, Inc. Coordinated Cases:*  
*24-cv-05454 (ER) (BCM); 24-cv-05455 (JAV) (BCM);*  
*24-cv-05456 (AKH) (BCM); 24-cv-05457 (JGK) (BCM);*  
*24-cv-05458 (VM) (BCM); 24-cv-05459 (JAV) (BCM);*  
*24-cv-05460 (LJL) (BCM); 24-cv-05462 (GHW) (BCM);*  
*24-cv-05463 (JLR) (BCM); 24-cv-05464 (JGK) (BCM);*  
*24-cv-05465 (GHW) (BCM); 24-cv-05466 (JHR) (BCM)*

*Non-party QI Venture Partners' Unopposed Letter Motion Requesting  
an Extension of Time to File an Opposition to Defendants' Motion to  
Compel QI*

Judge Moses:

We represent non-party QI Venture Partners ("QI"). On April 16, Defendants in the Coordinated Cases filed motions to compel QI to produce documents. QI's opposition papers are due tomorrow (April 30). Earlier this evening, Plaintiffs filed a Notice of Settlement in each of the Coordinated Cases. *See, e.g., Kobalt Music Publishing America, Inc. et al. v. Miami Heat Limited Partnership et al.*, No. 24-cv-05457, Dkt. No. 76.

The settlement, when finalized, will moot Defendants' motion and obviate the need for a responsive filing. In light of this development, QI requests an extension of time to file its opposition papers from April 30 until May 30. QI believes this extension should provide sufficient time for the parties to execute the settlement. QI has not previously requested an extension of any deadline.

Hon. Barbara Moses  
April 29, 2025

I have conferred with Mr. Slovick, counsel for the Defendants in the Coordinated Cases. The Defendants do not object to QI's requested extension.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R. Cohen", is written over the typed name.

Robert Cohen